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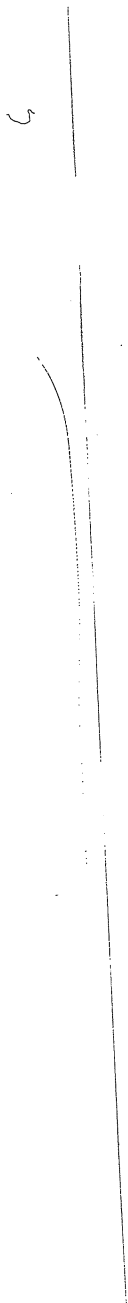


Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LOIS E. COLE,

Plaintiff,

- against -

ALLIED WASTE INDUSTRIES, INC.,
SUBURBAN CARTING CORPORATION,
and MICHAEL A. SABATINI,

Defendants.

**RESPONSE TO DEFENDANTS'
INTERROGATORIES**

CASE #03 CIV. 3251 9 (SCR)

HON. STEPHEN C. ROBINSON

LOIS E. COLE, having been duly sworn, makes the following answers to the
interrogatories propounded to her by the Defendants in the above-entitled case.

INTERROGATORY NO. 1:

State the Plaintiff's full name and any and all other names by which the Plaintiff
has been know since birth.

Answer: LOIS E. COLE

INTERROGATORY NO. 2:

Set forth the Plaintiff's current address and each and every other residence
address the Plaintiff has had during the past ten (10) years. Also set forth the dates of the
Plaintiff's residence at each address listed.

Answer: 4 Prospect Street, Bethel, CT 06801

INTERROGATORY NO.3:

Set forth the Plaintiff's social security number.

Answer: 046-50-7768

INTERROGATORY NO. 4:

Set forth the Plaintiff's marital status. If married, or ever married, set forth the names of each spouse of the Plaintiff and the periods during which the Plaintiff was married.

Answer: Divorced. Elden E. Webb, Jr. December 26, 1975 – March 27, 1986.

INTERROGATORY NO. 5:

Set forth the names and dates of birth of each child of the Plaintiff.

Answer: Elden E. Webb, III – November 14, 1976

Justin D. Webb – June 19, 1982

INTERROGATORY NO. 6:

Set forth the highest level of education attained by the Plaintiff and the name and address of the school where said level of education was attained.

Answer: ICS Newport/Pacific High School

INTERROGATORY NO. 7:

State the date and approximate time of day of the alleged occurrence.

Answer: On or about November 29, 2001, approximately 7:25 A.M.

INTERROGATORY NO. 8:

State in detail the location of the alleged occurrence, as nearly as may be stated.

Answer: , Old Post Road near the intersection of Routes 172 and 22, Town of Bedford, County of Westchester, State of New York.

INTERROGATORY NO. 9:

State in detail the specific act or acts or omissions claimed to constitute the negligence of the Defendants and which the Plaintiff alleges caused the claimed occurrence.

Answer: Driver of truck pulled out from stop sign. Apparently did not see Plaintiff immediately. When Defendant driver saw Plaintiff, he was unable to stop, hitting Plaintiff's vehicle head on.

INTERROGATORY NO. 10:

State each and every statute, law, ordinance, rule and regulation, if any, which it is claimed the Defendants violated.

Answer: Failure to Obey a Traffic Control Device, New York Vehicle and Traffic Law §1110(a); Failure to properly yield right of way in an intersection, New York Vehicle and Traffic Law §§1140, 1143; Reckless Driving, New Yor Vehicle and Traffic Law §1212;

INTERROGATORY NO. 11:

Set forth a detailed description of each and every injury allegedly sustained by the Plaintiff as a result of the alleged occurrence giving the exact location, duration and extent of said injuries.

Answer: Sprained Neck (severe loss of range of motion)
Sprained Back (muscle spasms which create sever pain and loss of movement)
Bruised Chest (from seat belt)
Bruised Knee
Locked Hip (created permanent limp)
Constant and Frequent Headaches (tightening and spasms of neck muscles)
Severe pain in shoulders (limits use of arms severely)
Constant numbness in hands and fingers

INTERROGATORY NO. 12:

Set forth a detailed description of those injuries allegedly sustained by the Plaintiff which are alleged to be permanent and the manner in which said permanency is allegedly manifested.

Answer: Sprained Neck (severe loss of range of motion)
Sprained Back (muscle spasms which create severe pain and loss of movement)
Locked Hip (created permanent limp)
Constant Headaches (tightening & spasms of neck muscles causing severe frequent headaches)
Severe pain in Shoulders (limits use of arms severely)
Constant Numbness in hands and fingers

INTERROGATORY NO.13:

Set forth the length of time it will be claimed that the Plaintiff was confined to:

- (a) hospital;
- (b) bed, and
- (c) house.

Each item is to be set forth separately and specifically.

Answer: (a) No overnight stays required
(b) Approximately 1 week required in bed

- (c) 6 weeks out of work. Four or Five one-day surgical procedures, with a few days each time to recuperate.

INTERROGATORY NO. 14:

Set forth the vocation of the Plaintiff and her average weekly earnings thereat during the fifty-two (52) week period immediately preceding the date of the alleged occurrence.

Answer: 6 weeks. Average weekly earnings, \$667.67. Regular overtime weekly \$125.00. Part time job, \$65.00 per week.

INTERROGATORY NO. 15:

Set forth the length of time it is claimed that the Plaintiff was incapacitated from her vocation.

Answer: Total incapacitation, approximately 1 week.
Partial incapacitation, to current date.

INTERROGATORY NO. 16:

Set forth the name and address of the employer of the injured Plaintiff.

Answer: Time of Accident: Carl Zeiss, Inc., Thornwood, N.Y. Women's Health Associates.

Current Employers: Women's Health Associates
United Alarm (part time position)

INTERROGATORY NO. 17:

Set forth if the Plaintiff was a full or part-time student at the time of the alleged accident. If so, state the name or number of said school; its address; and the Plaintiff's class thereat.

Answer: Plaintiff is not a student.

INTERROGATORY NO. 18:

Set forth the length of time it will be claimed that the Plaintiff was totally disabled.

INTERROGATORY NO. 19:

Set forth the length of time it is claimed that the Plaintiff was partially disabled.

Answer: From time of accident indefinitely.

INTERROGATORY NO. 20:

Set forth the total amounts claimed as special damages by the Plaintiff for:

- (a) hospital expenses,
- (b) physicians' services,
- (c) x-rays,
- (d) medical supplies,
- (e) loss of earnings;
- (f) nurses' services, and
- (g) any other expenses – describe in detail.

Answer: (a, b, c, d, f, g) Copies of bills received to current date attached. Includes hospital, physicians services, x-rays, medical supplies.

(e) Received Workers' Compensation from full time job. Weekly overtime wages lost: \$750.00. Part time wages lost, \$390.00.

INTERROGATORY NO. 21:

State the age of the allegedly injured Plaintiff on the date of the alleged occurrence.

Answer: 45 years old.

INTERROGATORY NO. 22:

Set forth the names, addresses and specialties of all physicians or other persons engaged in the business of or profession of healing who rendered treatment to or conducted examinations of the Plaintiff concerning the injuries allegedly sustained in the occurrence complained of herein, setting forth the approximate date for each and type of treatment or purpose of said examinations.

Answer: Northern Westchester Hospital – Mount Kisco, New York
Danbury Hospital, 24 Hospital Ave., Danbury, CT 06810
Dr. Theodore Blum, 5 School Street, Bethel, CT 06801
CT Family Orthopedics, White Street, Danbury, CT 06810
Carlson Therapy, 10B Elizabeth St., Bethel, CT 06801
Dr. Cassles, 10B Elizabeth St., Bethel, CT. 06801
Dr. Aaronson, 24 Hospital Avenue, Danbury, CT 06810 (IME)
CT Pain Care, Inc., Dr. Kloth, 109 Newtown Rd., Danbury, CT 06810
Dr. Prywys, 105 Newtown Road, Danbury, CT 06810 (IME)

INTERROGATORY NO. 23:

State whether or not the Plaintiff or her attorney ever received from any physician or hospital a written report of the condition and/or injuries claimed to be the result of the instant occurrence. If so, set forth the name and address of each such physician, hospital or other institution.

Answer: Yes. Dr. David S. Kloth; Northern Westchester Hospital Center; Department of Radiology, Danbury Hospital.

INTERROGATORY NO. 24:

Set forth the names, addresses and specialties of all physicians or other persons engaged in the business of or profession of healing who, within ten (10) years prior to the

occurrence complained of, rendered treatment or examinations of the Plaintiff, setting forth the approximate date of each and type of treatment or purpose of said examination.

Answer: Dr. Theodore Blum, 5 School Street, Beethel, CT 06801, Gen. Practitioner
Hypertension & Migraines
Has seen every three months for monitoring of blood pressure.

INTERROGATORY NO. 25:

State whether or not the Plaintiff ever made a claim or filed a suit against anyone arising from personal injuries sustained by the Plaintiff, other than for the within action; if so, list any such claims and suits and the dates, places and Courts thereof.

Answer: No

INTERROGATORY NO. 26:

State whether or not the Plaintiff at any time made any claim against an employer under the Workers' Compensation Law or under any Longshoremen's Act, and if so, state the names of such employers and their addresses; the approximate date of the accident; a description of the injuries so sustained and the name and address of the Workers' Compensation insurance carrier involved.

Answer: Fell on stairs, tore medial meniscus, right knee.
All Talk Communications
159 Main Street, Danbury, CT 06810
Do not remember year or Workers' Compensation insurance company involved.

INTERROGATORY NO. 27:

State whether or not the Plaintiff was ever confined either as an in-patient or as an out-patient to any hospital during her entire life, and as to each such admission in each such hospital, state the following:

- (a) the date of admission and discharge;
- (b) the nature of the ailment, illness or injury for which hospitalized;
- (c) the nature of any operations performed, and
- (d) the names and addresses of the physicians and/or surgeons under whose care the party was during the period of hospitalization.

Answer: Tonsils removed, 1973, Danbury Hospital – Hospital stay 1 week. Do not remember surgeon.

Two cysts removed from left breast, 1984. St Joseph's Hospital, Stamford, CT. Hospital stay approx. 1 week. Do not remember surgeon.

Cyst removed left ovary, do not remember year – Danbury Hospital, Dr. Bruce Lamonica – Hospital Stay, approx. 1 week.

Torn medial meniscus (right knee) – do not remember year. Surgical Center Sand Pit Road, Danbury, CT 06810, Dr. Tejian, one-day surgery – no overnight stay. Incapacitated approx. 3 weeks.

D&C Pre-Mature Delivery. Still born daughter, 1979, Danbury Hospital. Dr. Goldberg. Overnight stay.

Hysterectomy – July 1, 2003. Dr. Kenneth Blau, Danbury Hospital. Overnight stay.

INTERROGATORY NO. 28:

State whether or not any photographs exist with respect to any of the issues claimed to exist in this action. If so, state the name and address of the photographer.

Answer: No

INTERROGATORY NO. 29:

State the name and correct address of, or information sufficient to locate, each and every witness, including but not limited to eyewitnesses, who have or purport to have knowledge of the facts surrounding the happening of the occurrence which is the subject matter of this litigation, and which information is known to the Plaintiff, her attorneys, agents, servants and/or employees or investigators.

Answer: At this time, there are no other witnesses to the incident other than Plaintiff and Defendant driver.

INTERROGATORY NO. 30:

In the event there is a claim herein for any item of damage or expenses other than as previously set forth in the answers to these Interrogatories, explain in detail the nature of each such additional item of damages and/or expenses claimed and the purpose of each and to whom the expenses were paid an/or is owing.

Answer: None

INTERROGATORY NO. 31:

State whether or not the Plaintiff has ever been convicted of a crime; if so, state the number of said convictions and specify the details of each such conviction by indicating the definition of the crime, the date of conviction and the name and address of the Court in which the Plaintiff was convicted, if any.

Answer: No